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From:

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To:

Cc:

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, subject to anything that wishes to add I believe when we talk about prospective revocation of a determination letter what we had in mind was that the revocation would only be effective after the taxpayer is notified of the change in opinion. This would appear to mean that the revocation would not directly impact the taxpayer though it could theoretically impact if he is ever able to persuade a court that the taxpayer should restore his benefit. The agent refers to the plan year ending as probably the employer's final 5500 return. I am not sure what year that is though I thought all plan assets were returned to the taxpayer in ?

As to a citation for prospectively revoking the letter, see Treas. Reg. Sec. 601.201(l) and (m) which relates to IRC section 7805(b). I have not checked the IRM but I would imagine there must be something in it that deals with 7805(b) matters.